

LAW OFFICES
GOLDBERG, GODLES, WIENER & WRIGHT LLP
1229 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036-2413

HENRY GOLDBERG
JOSEPH A. GODLES
JONATHAN L. WIENER
LAURA A. STEFANI
DEVENDRA ("DAVE") KUMAR

HENRIETTA WRIGHT
THOMAS G. GHERARDI, P.C.
COUNSEL

THOMAS S. TYCZ*
SENIOR POLICY ADVISOR
*NOT AN ATTORNEY

(202) 429-4900
TELECOPIER:
(202) 429-4912

e-mail:
general@g2w2.com
website: www.g2w2.com

April 16, 2013

By Electronic Filing

Ms. Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: In the Matter of Progeny LMS, LLC, Petition for Waiver of
the Rules and Request for Expedited Treatment
WT Docket No. 11-49
Request for Testing**

Dear Ms. Dortch:

Attached is a letter sent by Inovonics Wireless Corporation ("Inovonics") to Progeny LMS, LLC, on March 18, 2013, requesting that the companies engage in joint testing to determine the effect of the Progeny system on Inovonics' life-safety emergency call alarm systems for seniors in Assisted Living & Independent Living campuses and emergency mobile duress systems for panic alarms used in hospitals, hotels, K-12 schools and higher education campuses.

Progeny has not responded to this request, though Inovonics believes that it is paramount that this testing occurs prior to any decision allowing Progeny to go forward with any commercial deployment of its system. Inovonics notes that the record indicates that several parties already have experienced interference from Progeny's operations in the Bay Area. Inovonics also stresses that the Part 15 parties that have filed in this proceeding represent just a small fraction of the

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unlicensed users on the band, meaning there are likely others who have experienced interference but do not realize the source. Given the life-safety use of its products, Inovonics must exercise the highest possible degree of care with respect to its customers and understand completely how the Progeny system will impact its customers' use of the Inovonics systems. Joint testing is the only responsible way to do this.

Please direct any questions to the undersigned.

Sincerely,
/s/
Laura Stefani
Attorney for Inovonics

Attachment

cc: Julie Knapp
Geraldine Matise
Ruth Milkman
Paul Murray



Mark Jarman
Inovonics Wireless Corporation
397 S. Taylor Ave.
Louisville, CO 80027
(303) 209-7175
mark.jarman@inovonics.com

March 18, 2013

Gary Parsons
Chief Executive Officer
NextNav LLC
7926 Jones Branch Dr., Suite 500
McLean, VA 22102

Dear Mr. Parsons:

Inovonics Wireless Corporation, for the past 25 years, has developed, manufactured and sold short-range wireless communication products that operate in the 902-928 MHz band. Our products serve a wide variety of customers in the security, senior care and submetering markets in United States.

Our systems are most often used to detect intrusion and/or cause an alarm to guard against property damage, loss, injury and loss of life. Many of the seniors that we support with our mobile duress pendants rely on the devices to communicate requests for assistance, and those responses need to be immediate, without any obstruction or delay. Detection with our security devices is critical as well, because interference within that system will impact people in retail stores, banks, museums and other commercial institutions to whom we provide protective solutions.

As you are aware, Inovonics utilizes the 902-928MHz band in full compliance with Part 15 rules and our installed indoor mobile dress system provides floor-level and often room to room location detection. We understand that testing was conducted by Progeny with only a handful of Part 15 devices. Given the life safety applications that we deploy, it would be irresponsible of us to accept only this minimal testing without further verification between your system and ours. For this reason, I am requesting that you agree to testing of our mobile duress system in conjunction with Progeny's NextNav Indoor Tracking system. We would propose that such testing include "in vivo" testing of our system in the presence of your fully-deployed operating systems in the San Francisco Bay area, and further that we test our repeater network and receivers/transceivers in reasonable proximity to your beacons/transmitters to address our concerns about receive overload.

Thank you for your time and consideration. I look forward to hearing from you soon.

Sincerely,

Mark Jarman
President
Inovonics Corp.